

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

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OFFICE OF THE CLERK

The United States Charges:

COUNT I

From on or about October 2012, and continuing through September 2014, and specifically on August 29, 2014, and September 22, 2014, in the District of Nebraska, and elsewhere, Perkins & Perkins Co., LLC., did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by preparing and submitting false certified payroll records relied upon by the United States Department of Labor claiming that employees were paid a prevailing wage as required by the Davis Bacon Act during Perkins & Perkins Co., LLC.'s participation on six (6) federal contracts when in truth employees were paid less than the prevailing wage resulting in a difference of \$75,666 between certified wages paid and actual wages paid.

In violation of Title 18, United States Code, Section 1001.

UNITED STATES OF AMERICA

JOSEPH P. KELLY
United States Attorney

United States Attorney

By: DONALD J. KLEINE
Assistant U.S. Attorney

The United States of America requests that trial of this case be held at Omaha, Nebraska,
pursuant to the rules of this Court.



DONALD J. KLEINE
Assistant U.S. Attorney